

The Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

DAYBREAK YOUTH SERVICES,
individually and on behalf of its former and
current patients,

Plaintiff,

v.

CHUCK ATKINS, in his official capacity as
Clark County Sheriff, MIKE COOKE, in his
official capacity as Clark County Undersheriff,
CHRISTOPHER LUQUE, in his capacity as
Clark County Sheriff's Office Sergeant, ADAM
BECK, in his official capacity as Clark County
Sheriff's Office Detective, and BRENT
WADDELL, in his official capacity as Clark
County Sheriff's Office Sergeant,

Defendants.

No. 3:18-cv-05521-BHS

**DECLARATION OF BRENT WADDELL
IN SUPPORT OF DEFENDANTS'
RESPONSE TO PLAINTIFF'S MOTION
FOR TEMPORARY RESTRAINING
ORDER**

**NOTED FOR HEARING:
June 19, 2019, 1:30 p.m.**

I, BRENT WADDELL, declare and state as follows:

1. I am a Sergeant with the Clark County Sheriff's Office in Clark County,
Washington. I am over the age of eighteen (18) and am competent to testify. I make this
Declaration based on my personal knowledge.

**DECLARATION OF BRENT WADDELL IN SUPPORT OF
DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION FOR
TEMPORARY RESTRAINING ORDER - 1 of 3**
3:19-CV-05521-BHS

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2. I have been employed at the Clark County Sheriff's Office for approximately 25 years and currently serve as the Public Information Officer for the Sheriff's Office. In my capacity as the Public Information Officer, one of my duties is to relay information about ongoing cases or matters involving the sheriff's office to the media and the public.

3. Recently, I was contacted by Columbian newspaper reporter Jerzy Shedlock inquiring about the status of the Clark County Sheriff's Office's investigation into Daybreak Youth Services ("Daybreak").

4. My conversation with Mr. Shedlock was limited to telling him that I had spoken with Sgt. Chris Luque and had verified that the matter had been turned over to the Clark County prosecutor's office for a determination of charges.

5. At no time during my communication with Mr. Shedlock did I provide names of any Daybreak patients. Likewise, I did not specify anyone who was the subject of the investigation by name. I would not have been able to do that even if asked because I did not have that information nor was I involved in the investigation of Daybreak.

6. Finally, at no time did I provide any information related to individuals who may have been seeking treatment for substance use disorder. To be clear, the topic of substance abuse disorder and/or treatment was not discussed at all.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 17 day of June, 2019.


BRENT WADDELL

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of June, 2019, I electronically filed the foregoing **DECLARATION OF BRENT WADDELL IN SUPPORT OF DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER** with the Clerk of the Court using the CM/ECF system, which will give notice of the filing electronically to the following:

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/s/ Pamela Hamilton

Pamela Hamilton, Legal Assistant
Clark County Prosecuting Attorney's Office – Civil Div.